



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

Dirk Kempthorne, Governor  
Toni Hardesty, Director

November 17, 2005

**Certified Mail No. 7005 1160 0000 1550 0344**

Alan Hieb  
Plant Manager  
The Amalgamated Sugar Company LLC  
Box 700  
Paul, ID 83347

RE: Facility ID No. 067-00001, The Amalgamated Sugar Company LLC, MiniCassia Facility  
Final Permit Letter

Dear Mr. Hieb:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-050424 to The Amalgamated Sugar Company LLC (TASCO) for a temporary emergency generator located at TASCO's MiniCassia facility. This permit is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho). This permit is effective immediately and is based on your permit application received October 25 and November 3, 2005.

This PTC replaces and supersedes the Director's Exemption issued by DEQ to TASCO on October 28, 2005. The Director's Exemption is invalid as of November 17, 2005.

This permit does not release TASCO from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator  
Air Quality Division

MB/BR/sd  
Enclosures

Permit No. P-050424



**Air Quality  
PERMIT TO CONSTRUCT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT No.:** P-050424

**FACILITY ID No.:** 067-00001

**AQCR:** 063

**CLASS:** A

**SIC:** 2063

**ZONE:** 12

**UTM COORDINATE (km):** 274.0, 4721.0

**1. PERMITTEE**

The Amalgamated Sugar Company – MiniCassia Facility

**2. PROJECT**

Permit to Construct - Temporary Emergency Generator

**3. MAILING ADDRESS**

Box 700

**CITY**

Paul

**STATE**

ID

**ZIP**

83347

**4. FACILITY CONTACT**

Alan Hieb

**TITLE**

Plant Manager

**TELEPHONE**

(208) 438-2115

**5. RESPONSIBLE OFFICIAL**

Alan Hieb

**TITLE**

Plant Manager

**TELEPHONE**

(208) 438-2115

**6. EXACT PLANT LOCATION**

50 South 500 West, Paul, Idaho

**COUNTY**

Minidoka

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Sugar Beet Processing

**8. GENERAL CONDITIONS**

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.

  
**TONI HARDESTY, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY**

**DATE ISSUED:** November 17, 2005

## **Table of Contents**

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE.....	3
1. PERMIT TO CONSTRUCT SCOPE .....	4
2. TEMPORARY EMERGENCY GENERATOR.....	5
3. PERMIT TO CONSTRUCT GENERAL PROVISIONS.....	7

## **Acronyms, Units, and Chemical Nomenclature**

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
°F	degree Fahrenheit
DEQ	Department of Environmental Quality
ft	feet or foot
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
kW	kilowatt
kW-hours/hr	kilowatt hours per hour
MW/hr	megawatt per hour (equivalent to 1,000 kW-hours/hr)
PTC	permit to construct
SIC	Standard Industrial Classification
T/yr	tons per year
UTM	Universal Transverse Mercator

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050424**

<b>Permittee:</b>	The Amalgamated Sugar Co.	<b>Facility ID No.</b> 067-00001	<b>Date Issued:</b>	November 17, 2005
<b>Location:</b>	MiniCassia Facility			

**1. PERMIT TO CONSTRUCT SCOPE*****Purpose***

- 1.1 The purpose for this permit is to allow for the construction and operation of an emergency generator that will be used on a temporary basis and will be fueled with low sulfur distillate fuel oil.

***Regulated Sources***

Table 1.1 lists all sources of regulated emissions in this PTC.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
1	<u>Emergency Generator</u>  Manufacturer: Caterpillar Maximum power output capacity (MW): 2 Allowable power output capacity (MW): 1 Allowable hours of operation (hours): 2,160 Allowable fuel type: Low sulfur fuel oil ( $\leq 0.1\%$ by wt) Stack height (ft): 11 Stack diameter (ft): Refer to modeling analysis Exhaust gas flow rate (acfm): 9,400 Exhaust gas temperature ( $^{\circ}\text{F}$ ): 300	None

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050424**

<b>Permittee:</b>	The Amalgamated Sugar Co.	<b>Facility ID No.</b> 067-00001	<b>Date Issued:</b>	November 17, 2005
<b>Location:</b>	MiniCassia Facility			

## **2. TEMPORARY EMERGENCY GENERATOR**

### **2.1 Process Description**

The emergency generator provides supplemental electrical power to the facility. Power production is limited to 1,000 kW-hours per hour (1.0 MW per hour), averaged over any 24-hour period. The emergency generator is allowed to operate on a temporary basis only, after which this permit will be terminated. Operating hours are limited to a maximum of 2,160. The emergency generator is allowed to use only low sulfur fuel oil. The sulfur content of the fuel oil is limited to a maximum of 0.1% by weight.

### **2.2 Emissions Control Description**

Emissions from the temporary emergency generator are uncontrolled.

### ***Emissions Limits***

#### **2.3 Opacity Limit**

Visible emissions from the temporary emergency generator stack, or any other stack, vent, or functionally equivalent opening associated with the temporary emergency generator, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

### ***Operating Requirements***

#### **2.4 Electrical Power Production Limit**

The electrical power produced by the temporary emergency generator shall not exceed 1,000 kW-hours per hour, averaged over any 24-hour period.

#### **2.5 Operating Hours Limit**

The operating hours of the temporary emergency generator shall not exceed 2,160.

#### **2.6 Fuel Type**

The temporary emergency generator shall burn low sulfur distillate fuel oil exclusively.

#### **2.7 Fuel Oil Sulfur Content Limit**

The sulfur content of the distillate fuel oil supplied to the temporary emergency generator shall not exceed 0.1% by weight.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050424**

<b>Permittee:</b>	The Amalgamated Sugar Co.	<b>Facility ID No.</b> 067-00001	<b>Date Issued:</b>	November 17, 2005
<b>Location:</b>	MiniCassia Facility			

***Monitoring and Recordkeeping Requirements*****2.8     Electrical Power Production Monitoring and Recordkeeping**

The permittee shall monitor and record the electrical power produced by the temporary emergency generator on a daily basis to demonstrate compliance with Permit Condition 2.4.

**2.9     Operating Hours Monitoring and Recordkeeping**

The permittee shall monitor and record the number of hours the temporary emergency generator operates once per day. Each day operating hours shall then be summed with the previous days operating hours to demonstrate compliance with the operating hours limit in Permit Condition 2.5.

**2.10   Fuel Oil Sulfur Content Monitoring and Recordkeeping**

The permittee shall demonstrate compliance with the fuel oil sulfur content limit specified in Permit Condition 2.7 by obtaining documentation of the fuel oil sulfur content analysis for each shipment of fuel oil on an as-received basis. Records of each fuel oil sulfur content analysis shall remain onsite for a period of one year and shall be made available to DEQ representatives upon request.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050424**

<b>Permittee:</b>	The Amalgamated Sugar Co.	<b>Facility ID No.</b> 067-00001	<b>Date Issued:</b>	November 17, 2005
<b>Location:</b>	MiniCassia Facility			

**3. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
  - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
  - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within five working days after occurrence:
  - Initiation of Construction - Date
  - Completion/Cessation of Construction - Date
  - Actual Production Startup - Date
  - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.



**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050424**

<b>Permittee:</b>	The Amalgamated Sugar Co.	<b>Facility ID No.</b> 067-00001	<b>Date Issued:</b>	November 17, 2005
<b>Location:</b>	MiniCassia Facility			

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.